

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

EAGLE HARBOR HOLDINGS, LLC,
and MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

CASE NO. C11-5503 BHS

VERDICT FORM

We, the jury, unanimously agree to the answers to the following questions and return them under the instructions of this court as our verdict in this case.

I. INFRINGEMENT CLAIMS

1. **Has Eagle Harbor proven by a preponderance of the evidence that Ford has actively induced Ford customers to infringe Claim 29 of the '137 patent?**

Yes (for Eagle Harbor) _____ No (for Ford) ☒ _____

2. **Has Eagle Harbor proven by a preponderance of the evidence that Ford's SYNC system infringes Claim 9 of the '260 patent?**

Yes (for Eagle Harbor) _____ No (for Ford) ☒ _____

3. Has Eagle Harbor proven by a preponderance of the evidence that Ford's SYNC system infringes the following claims of the '739 patent?

• Claim 1:

Yes (for Eagle Harbor) _____ No (for Ford) ☒

• Claim 3:

Yes (for Eagle Harbor) _____ No (for Ford) ☒

4. Has Eagle Harbor proven by a preponderance of the evidence that Ford's SYNC system infringes Claim 1 of the '119 patent?

Yes (for Eagle Harbor) _____ No (for Ford) ☒

II. INVALIDITY CLAIMS

5. Has Ford proven by clear and convincing evidence that Claim 29 of the '137 patent is invalid because it was "anticipated"?

Yes (for Ford) _____ No (for Eagle Harbor) ☒

6. Has Ford proven by clear and convincing evidence that Claim 9 of the '260 patent is invalid because:

• it was obvious?

Yes (for Ford) _____ No (for Eagle Harbor) ☒

• it did not contain an adequate written description?

Yes (for Ford) _____ No (for Eagle Harbor) ☒

7. **Has Ford proven by clear and convincing evidence that any of the following claims of the '739 patent is invalid because:**

a. Claim 1:

- it was obvious?

Yes (for Ford) _____ No (for Eagle Harbor) ☒

- it did not contain an adequate written description?

Yes (for Ford) _____ No (for Eagle Harbor) ☒

b. Claim 3:

- it was obvious?

Yes (for Ford) ☒ No (for Eagle Harbor) _____

- it did not contain an adequate written description?

Yes (for Ford) ☒ No (for Eagle Harbor) _____

8. **Has Ford proven by clear and convincing evidence that Claim 1 of the '119 patent is invalid because:**

- it was obvious?

Yes (for Ford) _____ No (for Eagle Harbor) ☒

- it did not contain an adequate written description?

Yes (for Ford) ☒ No (for Eagle Harbor) _____

III. DAMAGES

9. **If you have found that Ford has actively induced infringement of Claim 29 of the '137 patent and that Claim 29 is not invalid, what amount has Eagle Harbor proved it is entitled to as a reasonable royalty on Ford's Active Park Assist product?**

Rate: _____

Total Damages: _____

10. If you have found that any Asserted Claim of an Asserted Patent is infringed by Ford's SYNC System and is not invalid, what amount has Eagle Harbor proved it is entitled to as a reasonable royalty on Ford's SYNC System?

Rate: _____

Total Damages: _____

III. TRADE SECRETS MISAPPROPRIATION CLAIMS

11. Has Ford proven by a preponderance of the evidence that Dan Preston misappropriated one or more of Ford's trade secrets?


Yes (for Ford) ☒ No (for Dan Preston) _____

12. Has Ford proven by a preponderance of the evidence that Eagle Harbor misappropriated one or more of Ford's trade secrets?

Yes (for Ford) ☒ No (for Eagle Harbor) _____

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. The Presiding Juror should then sign and date the verdict form in the spaces below and notify the Clerk that you have reached a verdict. The Presiding Juror should retain possession of the verdict form and bring it when the jury is brought back into the courtroom.

DATED: March 26, 2015

By: 
Presiding Juror